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February 3, 2012

Comments: Draft Action Agenda Update

Thank you for the opportunity to provide comments on the Action Agenda update including the proposed Near Term Actions. We appreciate the work that has gone into this update, and the size of the task that you have been asked to undertake.

Cities stand ready, willing and able to be productive partners in the recovery of the Puget Sound. As you know, we are already expending great resources and effort in that direction. From updates to our Shoreline Management Programs, to adoption of Critical Areas Ordinances in our Growth Management Act comprehensive plans, to hundreds of millions of dollars in investments in stormwater protections, to supporting salmon recovery – cities play a vital role in the State's efforts to clean up the Puget Sound.

It is no surprise that city budgets have been hard hit in recent years. We have been forced to do more with less across all levels of city government. As we are asked to redouble our efforts in Puget Sound recovery, we will be looking closely to see what sorts of resources are proposed to be brought to bear to help us meet that challenge. We appreciate the elements of the Action Agenda that recognize the need for increased funding for local governments if we are to fulfill the role that is set out for us in the Action Agenda. We are concerned by the breadth of near term actions that anticipate active local government engagement. We are not sure that this Action Agenda fully acknowledges how constrained our ability to take on some of these new expectations will be given the current economic climate.

We were hoping for a more refined and prioritized list of near term actions with clear and achievable expectations. As we understand it the prioritization process will occur after the Action Agenda is adopted. Frankly, the sheer number and often vague nature of many of these near term actions has led many jurisdictions to hold back comment until it becomes clearer exactly which of these proposed actions will rise to the top. The proposed timelines for many of these near term actions seem incredibly ambitious with over thirty deadlines by 2013 in "Strategy A" alone. We strongly urge the Partnership to allow for meaningful public comment to inform the eventual adoption of priorities.

As this Action Agenda process has gone forward, we have been watching to see how these proposals support and recognize our existing efforts. Although progress has been made on this front, more explicit recognition of existing local efforts will help ensure that policy makers have the full picture of ongoing activities that work towards protecting the Sound. This recognition will also ensure that continued support of existing regulatory responsibilities can be accurately prioritized amongst other items – a process that only prioritizes new actions risks undervaluing existing efforts that may provide greater ecological benefit.

Cities would like additional clarity around the role of the partnership in relation to other regulatory agencies and their programs involving clean-up of the Puget Sound. We continue to hear concerns from our members about the potential future consequences of meeting the targets in the Action Agenda. There is concern about how this information or progress on near term actions may be used by the Partnership as they work with other agencies to direct grant funding. This concern is magnified by the scope and timelines for the strategies and near term actions provided for in this draft of the Action Agenda. We need to see more clarity around what exactly will be expected from cities with regards to these actions, and on what timelines.

Alongside many other stakeholders, cities have been providing formal and informal comments throughout the Action Agenda update process. While many of our comments have been reflected, many others have not. We request that the Partnership provide stakeholders with a response to comments detailing how comments were or were not addressed and why. For instance, we have requested on several occasions to change the language in strategy A1.3 about improving the “willingness” of local governments to take action to meet Puget Sound recovery goals. We’ve requested that less charged language be used for that strategy and although we have not heard a reason why, it has remained. Another example is Action 1.1, NTA 1 – which directs an interagency workgroup to develop regional ecosystem protection standards with a decision making framework. We presume that we will be expected to utilize this decision making framework and asked that local governments be a part of the panel developing it, rather than just agencies. Although the language for that action has been changed since earlier drafts, our concern was not addressed and we do not know why.

Cleaning up the Puget Sound by 2020 is an important and complicated task. Cities intend to do our part to help everyone in Washington meet this goal. A more focused and refined Action Agenda will help ensure that we have the tools and direction to be effective partners in this effort.

Thanks again for the opportunity to comment.

Sincerely,



Dave Williams
Director of State & Federal Relations, AWC